INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

-TO: Interested Parties / Applicant

DATE: July 6, 2007

RE: VTI of Indiana / 145-22642-00034

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 03/23/06

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.in.gov/idem

Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

VTI of Indiana, Inc.
1406 South Meridian Street
Shelbyville, Indiana 46176

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 145-22642-00034	
Issued by: Original Signed By: Matt Stuckey for: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: July 6, 2007 Expiration Date: July 6, 2012

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a countertop manufacturing source.

Source Address:	1406 South Meridian Street, Shelbyville, Indiana 46176
Mailing Address:	1000 Industrial Park, Holstein, Iowa 51025
General Source Phone Number:	712-368-4381
SIC Code:	2541
County Location:	Shelby
Source Location Status:	Basic nonattainment for 8-hour ozone Attainment for all remaining criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source Under PSD and Emission Offset Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) woodworking operation, identified as Unit 002, installed prior to 1980, equipped with a baghouse for particulate control, identified as CE-002, capable of exhausting inside only, maximum capacity: 19,388 pounds of wood particle board per hour.

(b) One (1) wood coating line, identified as Line 1, installed prior to 1980, with a maximum capacity of 8,362 pounds of wood particle board per hour, consisting of the following:

(1) One (1) roller and spray application unit, identified as Unit 009, exhausting to general ventilation.

(2) One (1) spray applicator, identified as Unit 009B, equipped with HVLP spray applicators and an enclosure for overspray control, exhausting to general ventilation.

(3) One (1) woodworking operation, identified as Unit 005, exhausting to a baghouse for particulate control, identified as CE-002, capable of exhausting inside only.

(c) One (1) wood coating line, identified as Line 2, installed prior to 1980, with a maximum capacity of 8,362 pounds of wood particle board per hour, consisting of the following:

(1) One (1) roller application unit, identified as Unit 010, exhausting to general ventilation.

(2) One (1) spray applicator, identified as Unit 010B, equipped with HVLP spray applicators and an enclosure for overspray control, exhausting to general ventilation.

(3) One (1) woodworking operation, identified as Unit 006, exhausting to a baghouse for particulate control, identified as CE-002, capable of exhausting inside only.

(d) One (1) wood coating line, identified as Line 3, installed prior to 1980, with a maximum capacity of 2,664 pounds of wood particle board per hour, consisting of the following:

(1) One (1) spray applicator, identified as Unit 011-1, installed in 2000, equipped with HVLP spray applicators, exhausting to general ventilation.

(2) One (1) hand roll edge station, identified as Unit 001D, exhausting to general ventilation.

(3) One (1) spray applicator, identified as Unit 011B, equipped with HVLP spray applicators, exhausting to general ventilation.

(4) One (1) woodworking operation, identified as Unit 007, exhausting to a baghouse for particulate control, identified as CE-002, capable of exhausting inside only.

(e) One (1) product washing station, identified as Unit 013, installed prior to 1980, maximum capacity: 19,388 pounds of wood countertops per hour.

(f) Two (2) storage hoppers, identified as Units 003 and 004, installed prior to 1980, maximum capacity: 969 pounds of sawdust per hour, total.

(g) Two (2) sawdust heaters, identified as Unit 003A and Unit 004A, exhausting to Stack 003 and Stack 004, respectively, installed in 1985, with a throughput of 969 pounds of sawdust per hour, total, and a heat input capacity of 4.0 million British thermal units per hour, total.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities as defined in 326 IAC 2-7-1 (21):

Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 Permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

(a) This permit, F 145-22642-00034, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a state health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F 145-22642-00034 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or

anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10 (b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity

monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003

Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145 (a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification or permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused

startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this

permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified

by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)] Woodworking, Wood Coating Lines, and Product Washing Station

(a) One (1) woodworking operation, identified as Unit 002, installed prior to 1980, equipped with a baghouse for particulate control, identified as CE-002, capable of exhausting inside only, maximum capacity: 19,388 pounds of wood particle board per hour.

(b) One (1) wood coating line, identified as Line 1, installed prior to 1980, with a maximum capacity of 8,362 pounds of wood particle board per hour, consisting of the following:

(1) One (1) roller and spray application unit, identified as Unit 009, exhausting to general ventilation.

(2) One (1) spray applicator, identified as Unit 009B, equipped with HVLP spray applicators and an enclosure for particulate overspray, exhausting to general ventilation.

(3) One (1) woodworking operation, identified as Unit 005, exhausting to a baghouse for particulate control, identified as CE-002, capable of exhausting inside only.

(c) One (1) wood coating line, identified as Line 2, installed prior to 1980, with a maximum capacity of 8,362 pounds of wood particle board per hour, consisting of the following:

(1) One (1) roller application unit, identified as Unit 010, exhausting to general ventilation.

(2) One (1) spray applicator, identified as Unit 010B, equipped with HVLP spray applicators and an enclosure for particulate overspray, exhausting to general ventilation.

(3) One (1) woodworking operation, identified as Unit 006, exhausting to a baghouse for particulate control, identified as CE-002, capable of exhausting inside only.

(d) One (1) wood coating line, identified as Line 3, installed prior to 1980, with a maximum capacity of 2,664 pounds of wood particle board per hour, consisting of the following:

(1) One (1) spray applicator, identified as Unit 011-1, installed in 2000, equipped with HVLP spray applicators, exhausting to general ventilation.

(2) One (1) hand roll edge station, identified as Unit 001D, exhausting to general ventilation.

(3) One (1) spray applicator, identified as Unit 011B, equipped with HVLP spray applicators, exhausting to general ventilation.

(4) One (1) woodworking operation, identified as Unit 007, exhausting to a baghouse for particulate control, identified as CE-002, capable of exhausting inside only.

(e) One (1) product washing station, identified as Unit 013, installed prior to 1980, maximum capacity: 19,388 pounds of wood countertops per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate [326 IAC 6-3-2][326 IAC 2-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the four (4) woodworking operations, identified as Unit 002, Unit 005, Unit 006, and Unit 007 shall not exceed 29.9 pounds per hour, total, when operating at a process weight rate of 38,776 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance with this limitation shall also render the requirements of 326 IAC 2-2, PSD, not applicable.

D.1.2 Particulate Matter (PM_{10}) [326 IAC 2-2] [326 IAC 2-8-4]

The PM_{10} emissions from the four (4) woodworking operations, identified as Unit 002, Unit 005, Unit 006, and Unit 007, shall not exceed 18.8 pounds per hour, total. Compliance with this limitation shall render the requirements of 326 IAC 2-7, Part 70, and 326 IAC 2-2, PSD, not applicable.

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

The amount of an individual HAP used at the one (1) product washing station, identified as Unit 13, and the three (3) wood coating lines, identified as Lines 1 through 3, shall be limited to less than nine and sixty-seven hundredths (9.67) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit the amount of each individual HAP used at the one (1) product washing station, in combination with unrestricted potential emission from all other processes, to less than ten (10.0) tons from the entire source.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the four (4) woodworking operations, identified as Unit 002, Unit 005, Unit 006, and Unit 007 and their baghouse, identified as CE-002.

Compliance Determination Requirements

D.1.5 Particulate Control

(a) In order to comply with Condition D.1.1, the baghouse, identified as CE-002, for particulate control shall be in operation and control emissions from the four (4) woodworking operations, identified as Units 002, 005, 006, and 007, at all times that any of the four (4) woodworking units are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.6 Hazardous Air Pollutants (HAPs)

Compliance with the HAP content and usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ,

reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse=s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-4(16)]

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.2 and D.1.5, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limit and emission limits established in Conditions D.1.2 and D.1.5.

(1) The HAP content of each solvent used.

(2) The amount of solvent used less water on daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The total HAP usage for each month and

(4) The weight of HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7. and the dates the vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Sawdust Heaters

(g) Two (2) sawdust heaters, identified as Unit 003A and Unit 004A, exhausting to Stack 003 and Stack 004, respectively, installed in 1985, with a throughput capacity of 969 pounds of sawdust per hour, total, and a heat input capacity of 4.0 million British thermal units per hour, total.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the two (2) sawdust heaters, identified as Unit 003A and Unit 004A, shall not exceed 2.52 pounds per hour, total, when operating at a process weight rate of 969 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: VTI of Indiana, Inc.
Source Address: 1406 South Meridian Street, Shelbyville, Indiana 46176
Mailing Address: 1000 Industrial Park, Holstein, Iowa 51025
FESOP No.: F 145-22642-00034

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify) _____

☐ Report (specify) _____

☐ Notification (specify) _____

☐ Affidavit (specify) _____

☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Signature:
Printed Name:
Title/Position:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: VTI of Indiana, Inc.
Source Address: 1406 South Meridian Street, Shelbyville, Indiana 46176
Mailing Address: 1000 Industrial Park, Holstein, Iowa 51025
FESOP No.: F 145-22642-00034

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: VTI of Indiana, Inc.
Source Address: 1406 South Meridian Street, Shelbyville, Indiana 46176
Mailing Address: 1000 Industrial Park, Holstein, Iowa 51025
FESOP No.: F 145-22642-00034
Facilities: One (1) product washing station, identified as Unit 013 and three (3) wood coating lines, identified as Lines 1 through 3.
Parameter: Individual HAP usage
Limit: Less than nine and sixty-seven hundredths (9.67) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:_____

Month	Individual HAP usage (tons)	Individual HAP usage (tons)	Individual HAP usage (tons)
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: VTI of Indiana, Inc.
Source Address: 1406 South Meridian Street, Shelbyville, Indiana 46176
Mailing Address: 1000 Industrial Park, Holstein, Iowa 51025
FESOP No.: F 145-22642-00034

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ANo deviations occurred this reporting period@.
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	**VTI of Indiana, Inc.**
Source Location:	**1406 South Meridian Street, Shelbyville, Indiana 46176**
County:	**Shelby**
SIC Code:	**2541**
Permit Renewal No.:	**F 145-22642-00034**
Permit Reviewer:	**Michael A. Morrone/MES**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from VTI of Indiana, Inc. relating to the operation of the following emission units and pollution control devices at a countertop manufacturing source:

(a) One (1) woodworking operation, identified as Unit 002, installed prior to 1980, equipped with a baghouse for particulate control, identified as CE-002, capable of exhausting inside only, maximum capacity: 19,388 pounds of wood particle board per hour.

(b) One (1) wood coating line, identified as Line 1, installed prior to 1980, with a maximum capacity of 8,362 pounds of wood particle board per hour, consisting of the following:

(1) One (1) roller and spray application unit, identified as Unit 009, exhausting to general ventilation.

(2) One (1) spray applicator, identified as Unit 009B, equipped with HVLP spray applicators and an enclosure for overspray control, exhausting to general ventilation.

(3) One (1) woodworking operation, identified as Unit 005, exhausting to a baghouse for particulate control, identified as CE-002, capable of exhausting inside only.

(c) One (1) wood coating line, identified as Line 2, installed prior to 1980, with a maximum capacity of 8,362 pounds of wood particle board per hour, consisting of the following:

(1) One (1) roller application unit, identified as Unit 010, exhausting to general ventilation.

(2) One (1) spray applicator, identified as Unit 010B, equipped with HVLP spray applicators and an enclosure for overspray control, exhausting to general ventilation.

(3) One (1) woodworking operation, identified as Unit 006, exhausting to a baghouse for particulate control, identified as CE-002, capable of exhausting inside only.

(d) One (1) wood coating line, identified as Line 3, installed prior to 1980, with a maximum capacity of 2,664 pounds of wood particle board per hour, consisting of the following:

(1) One (1) spray applicator, identified as Unit 011-1, installed in 2000, equipped with HVLP spray applicators, exhausting to general ventilation.

(2) One (1) hand roll edge station, identified as Unit 001D, exhausting to general ventilation.

(3) One (1) spray applicator, identified as Unit 011B, equipped with HVLP spray applicators, exhausting to general ventilation.

(4) One (1) woodworking operation, identified as Unit 007, exhausting to a baghouse for particulate control, identified as CE-002, capable of exhausting inside only.

(e) One (1) product washing station, identified as Unit 013, installed prior to 1980, maximum capacity: 19,388 pounds of wood countertops per hour.

(f) Two (2) storage hoppers, identified as Units 003 and 004, installed prior to 1980, maximum capacity: 969 pounds of sawdust per hour, total.

(g) Two (2) sawdust heaters, identified as Unit 003A and Unit 004A, exhausting to Stack 003 and Stack 004, respectively, installed in 1985, with a throughput capacity of 969 pounds of sawdust per hour, total, and a heat input capacity of 4.0 million British thermal units per hour, total.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

There are no emission units that were constructed and/or are operating without a permit.

Emission Units and Pollution Control Equipment Removed From the Source

The following emission units have been removed from the source:

One (1) standard air atomization spray booth (Line 4), used for coating wood cabinets, with dry filters for overspray, exhausting at Stack 001, installed prior to 1980.

History

On February 10, 2006, VTI of Indiana, Inc. submitted an application to the OAQ requesting to renew its operating permit. VTI of Indiana, Inc. was issued a Federally Enforceable State Operating Permit Renewal (FESOP), F 145-13902-00034, on May 9, 2001.

Existing Approvals

Since the issuance of the FESOP 145-13902-00034 on May 9, 2001, the source has not received any additional approvals since the issuance of the original FESOP.

All terms and conditions from previous approvals were either incorporated as originally stated, revised or deleted by this FESOP. The following terms and conditions have been revised:

(a) Condition D.1.2 from F 145-13902-00034, issued on May 9, 2001, states that:

D.1.2 HAPs Limitations [326 IAC 2-8-4]

(a) The worst case single HAP delivered to the coating applicators in coating lines 1 - 4 shall not exceed a total of ten (10) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply.

(b) The combination of HAPs delivered to the coating applicators in coating lines 1 - 4 shall not exceed a total of twenty-five (25) tons per twelve (12) consecutive month period tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply.

Reason not incorporated:

The unrestricted potential to emit HAPs from the entire source is less than twenty-five (25.0) tons per year for a combination of all HAPs since the one (1) air atomization spray station, identified as Line 4, was removed from the source in 2007. Therefore, a limit for total HAPs is no longer necessary.

The unrestricted potential emissions of the worst case individual HAP are 0.115 tons per year of toluene from the three (3) wood coating lines, identified as Lines 1 through 3. In addition, the unrestricted potential emissions of toluene are 12.4 tons per year from the one (1) product washing station, identified as Unit 013. Therefore, toluene from the one (1) product washing station, identified as Unit 013, is limited to less than 9.67 tons per year. Therefore, no individual HAP limit is required for the coatings.

(b) Conditions D.1.3 and D.1.4 from F 145-13902-00034, issued on May 9, 2001:

D.1.3 PM_{10} Emission Limitation [326 IAC 2-8-4]

The PM_{10} overspray emissions from the coating lines 1 - 4 shall not exceed 2.81 pounds per hour which represents the unrestricted potential to emit for coating lines 1 - 4. Therefore, the requirements of 326 IAC 2-7 do not apply and no record keeping or reporting is required.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the coating lines 1 - 4 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Since the one (1) air atomization spray booth, identified as Line 4 was removed from the source in 2007, there are no PM/PM_{10} emissions as a result of overspray. Therefore, Condition D.1.3 is no longer necessary and Condition D.1.4 was revised to cover only the woodworking operations at the source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
003	Sawdust Heater 003A	29.9	0.4	264	250
004	Sawdust Heater 004A	28.0	0.5	264	250

Emission Calculations

See pages 1 through 9 of Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Shelby County.

Pollutant	Status
PM_{10}	attainment
$PM_{2.5}$	attainment
SO_2	attainment
NO_X	attainment
8-hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

(a) Shelby County has been classified as unclassifiable or attainment for $PM_{2.5}$. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for $PM_{2.5}$ emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for $PM_{2.5}$ emissions, it has directed states to regulate PM_{10} emissions as a surrogate for $PM_{2.5}$ emissions. See the State Rule Applicability – Entire Source section.

(b) Volatile organic compounds (VOC) and nitrogen oxides (NO_X) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_X emissions are considered when evaluating the rule applicability relating to ozone standards. Shelby County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

(c) Shelby County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(e) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	2,435
PM_{10}	2,432
SO_2	0.438
VOC	17.2
CO	10.5
NO_X	8.58

HAPs	tons/year
Toluene	12.4
Hydrogen Chloride	0.333
Formaldehyde	0.077
Benzene	0.074
Hexane	0.038
Styrene	0.033
Total	13.0

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM_{10} is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their PM_{10} emissions to less than Title V levels, therefore the source will be issued a FESOP.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than one hundred (100) tons per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year. However, the source has agreed to limit their single HAP emissions below Title V limits. Therefore, the source will be issued a FESOP

(d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted towards the determination of Part 70 applicability.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential To Emit (tons/year)						
Process/emission unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Four (4) woodworking operations, identified as Units 002, 005, 006, and 007	131	82.3	-	-	-	-	-
One (1) wood coating Line, identified as Line 1, consisting of:							Less than 9.67 single (toluene); 9.71 total
One (1) roller application unit, identified as Unit 009	-	-	-	4.66	-	-	
One (1) spray applicator, identified as Unit 009B	0.965	0.965	-	15.0	-	-	
One (1) wood coating line, identified as Line 2, consisting of:							
One (1) roller application unit, identified as Unit 010.	-	-	-	4.66	-	-	
One (1) spray applicator, identified as Unit 010B.	0.965	0.965	-	15.0	-	-	
One (1) wood coating line, identified as Line 3, consisting of:							
One (1) spray applicator, identified as Unit 011-1	-	-	-	negligible	-	-	
One (1) hand roll edge, identified as Unit 011D	-	-	-	0.582	-	-	
One (1) spray applicator, identified as Unit 011B.	1.48	1.48	-	4.78	-	-	
One (1) product washing station, identified as Unit 13.	-	-	-	9.55	-	-	
Two (2) sawdust heaters, identified as Units 003A and 004A	7.01	6.61	0.438	0.228	10.5	8.58	0.333 single (hydrogen chloride); 0.513 total
Two (2) storage hoppers, identified as Units 003 and 004	1.59	1.59	-	-	-	-	-
Insignificant Activities *(unpaved roads)*	3.35	1.03	-	-	-	-	-
Total Emissions	**146**	**94.9**	**0.438**	**54.5**	**10.5**	**8.58**	**Less than 10.0 single; Combination of all HAPS 10.3**

The above table represents the unrestricted potential to emit of the source except for the following:

(a) Any single HAP is limited to nine and sixty-seven hundredths (9.67) tons per twelve (12) consecutive month period at the one (1) product washing station, identified as Unit 13, and the three (3) wood coating lines, identified as Lines 1 through 3. This will limit any single HAP to less than ten (10.0) tons per year from the entire source.

(b) PM and PM_{10} emissions from the four (4) woodworking operations are limited to 18.8 pounds per hour, or 82.3 tons per year, total. Compliance with these limitations shall satisfy the requirements of 326 IAC 2-8-4, FESOP, 326 IAC 6-3-2, and render 326 IAC 2-2, PSD, not applicable.

(c) PM and PM_{10} emissions from the one (1) spray applicator, identified as Unit 009B, and the one (1) spray applicator, identified as Unit 010B, are the controlled potential to emit. The controls are pursuant to 326 IAC 6-3-2.

Potential To Emit (tons/year)						
Process/emission unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**
Four (4) woodworking operations, identified as Units 002, 005, 006, and 007	131	82.3	-	-	-	-
One (1) wood coating Line, identified as Line 1, consisting of:						
One (1) roller application unit, identified as Unit 009	-	-	-	4.66	-	-
One (1) spray applicator, identified as Unit 009B	0.965	0.965	-	15.0	-	-
One (1) wood coating line, identified as Line 2, consisting of:						
One (1) roller application unit, identified as Unit 010.	-	-	-	4.66	-	-
One (1) spray applicator, identified as Unit 010B.	0.965	0.965	-	15.0	-	-
One (1) wood coating line, identified as Line 3, consisting of:						
One (1) spray applicator, identified as Unit 011-1	-	-	-	negligible	-	-
One (1) hand roll edge, identified as Unit 011D	-	-	-	0.582	-	-
One (1) spray applicator, identified as Unit 011B.	1.48	1.48	-	4.78	-	-
One (1) product washing station, identified as Unit 013.	-	-	-	9.55	-	-
Two (2) storage hoppers, identified as Units 003 and 004	1.59	1.59	-	-	-	-
Two (2) sawdust heaters, identified as Units 003A and 004A	7.01	6.61	0.438	0.228	10.5	8.58
Total Emissions	146	93.9	0.438	54.5	10.5	8.58
Major Source Threshold	250	250	250	100	250	250

(a) This existing stationary source is not major for PSD because the emissions of each attainment criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

(b) This existing stationary source is not major for Emission Offset because the emissions of the nonattainment pollutant, VOC, are less than one hundred (<100) tons per year.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

The following federal rules are applicable to the source:

(a) The two (2) sawdust heaters, identified as Unit 003A and Unit 004A, are not residential wood heaters. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart AAA, Standards of Performance for New Residential Wood Heaters, are not included in the permit.

(b) There are no other New Source Performance Standards included in the permit.

(c) The source is an area source for HAPs. Therefore, the requirements of the National Emission Standard for Hazardous Air Pollutants, 40 CFR 63, Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations, are not included in the permit for the three (3) wood coating lines, identified as Lines 1 through 3.

(d) There are no other National Emission Standards for Hazardous Air Pollutants included in the permit.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

(a) Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

(b) The unrestricted potential emissions of PM/PM_{10} are greater than two hundred fifty (250) tons per year. However, the source will limit PM/PM_{10} emissions to less than two hundred fifty (250) tons per year, as follows:

(1) Pursuant to 326 IAC 6-3-2, PM emissions from the four (4) woodworking operations, identified as Units 002, 005, 006, and 007, all controlled by a common baghouse, identified as CE-002, shall be limited to 29.9 pounds per hour, total. This will limit the PM emissions from the four (4) woodworking operations, identified as Units 002, 005, 006, and 007 to 131 tons per year, total, and less than two hundred fifty (250) tons for the entire source.

(2) PM_{10} emissions for the four (4) woodworking operations, identified as Units 002, 005, 006, and 007, the PM_{10} from the four (4) woodworking operations shall be limited to 18.8 pounds per hour, total, equivalent to 82.3 tons per year, total. This

will limit PM_{10} emissions from the entire source to less than one hundred (<100) tons per year.

The unrestricted potential emissions of all remaining attainment criteria pollutants are less than two hundred fifty (250) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source catergories, is a minor source, pursuant to 326 IAC 2-2, PSD.

326 IAC 2-3 (Emission Offset)

The unrestricted potential emissions of NO_X and VOC are less than one hundred (<100) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is a minor source, pursuant to 326 IAC 2-3, Emission Offset.

326 IAC 2-4.1-1 (New source toxics control)

The operation of the one (1) spray applicator, identified as Unit 011-1, will emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not located in Lake or Porter County, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 2-8-4, FESOP

(a) The source-wide usage of an individual HAP shall be limited to less than ten (<10.0) tons per year. Compliance with this limitation will allow the source to comply with the requirements of 326 IAC 2-8-4, FESOP. The specific limitation is as follows:

The amount of toluene used at the one (1) product washing station, identified as Unit 13, and the three (3) wood coating lines, identified as Lines 1 through 3, shall be limited to nine and sixty-seven hundredths (9.67) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit the amount of toluene used at the one (1) product washing station and the three (3) wood coating lines to less than nine and sixty-seven hundredths (9.67) tons and less than ten (<10.0) tons from the entire source, including unrestricted potential emissions from all other processes.

(b) The source-wide amount of PM_{10} shall be limited to less than one hundred (<100) tons per year. Compliance with the following limitations will allow the source to comply with the requirements of 326 IAC 2-8-4, FESOP.

The PM_{10} emissions from the four (4) woodworking operations, identified as Units 002, 005, 006, and 007, shall be limited to less than 18.8 pounds per hour or 82.3 tons per year, total. This will limit PM_{10} emissions from the entire source to less than one hundred (100) tons per year, including unrestricted potential emissions from all other processes.

(c) The unrestricted potential emissions of all remaining criteria pollutants are less than one hundred (<100) tons per year. Therefore, no additional limits are required in order for the source to comply with the requirements of 326 IAC 2-8-4, FESOP.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in the permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

(a) The one (1) roller application unit, identified as Unit 009, uses roll coating to apply materials. Therefore, pursuant to 326 IAC 6-3-1(a)(15), the requirements of 326 IAC 6-3-2 are not applicable.

(b) The one (1) spray applicator unit, identified as Unit 009B, and the one (1) spray applicator unit, identified as Unit 010B, each have potential particulate emissions of greater than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-2(e), they shall utilize a dry particulate filter, waterwash, or equivalent control device to control emissions. The source has proposed an equivalent control device as follows:

Both surface coating facilities consist of a conveyor line where particle board is transported to a central area for surface coating with adhesive. The enclosed area is approximately six (6) feet high from the floor to the roof and is approximately five (5) feet in length and width. The walls of the enclosure are made from cardboard. Before any particle board is moved into the enclosure, brown paper is rolled underneath the area in the enclosure where spraying will occur from rollers on either side of the conveyor belt. The spraying of the particle board occurs with the spray applicators pointing upwards towards the roof of the enclosure.

The source performed a particulate test of Unit 010B on February 20th through 21st, 2007 to evaluate the efficiency of the enclosure. They stated that this test would also be representative of Unit 009B. The test took place over two (2) consecutive ten (10) hour shifts. The weight of each piece of the cardboard structure was measured before and after the test period. The total gain in weight of the cardboard pieces for the test period was conservatively estimated to be 1.00 gram for the two (2) consecutive ten-hour shifts, even though overspray was not observed on any of the pieces. Overspray was observed on the paper that was rolled underneath the conveyor belt during the test period.

The Compliance Data section of IDEM, OAQ reviewed the above procedure during March 2007 and the construction is an equivalent control device.

The efficiency of the enclosure is calculated as follows:

Efficiency (%) = 100% - [(Amount of particulate overspray) / (Potential particulate emissions) X 100%]

= 100% - [(1 gram/20 hrs) X (0.0022 pounds/gram) X 8,760 hours / (40,646 pounds/8,760 hrs) X 100%]

= 100% – 20.76%

= 79.2%

As a result of the use of the enclosure, the potential to emit PM is reduced from 4.64 tons per year (as calculated on page 1 of 9 of Appendix A of this document) to 0.965 tons per year for both the one (1) spray applicator unit, identified as Unit 009B and the one (1) spray applicator unit, identified as Unit 010B.

(c) The one (1) roller application unit, identified as Unit 010, uses roll coating to apply materials. Therefore, pursuant to 326 IAC 6-3-1(a)(15), the requirements of 326 IAC 6-3-2 are not applicable.

(d) The one (1) spray applicator, identified as Unit 011-1, has potential PM emissions of less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 are not applicable.

(e) The one (1) hand roll edge, identified as Unit 011D, uses roll coating to apply materials. Therefore, pursuant to 326 IAC 6-3-1(a)(15), the requirements of 326 IAC 6-3-2 are not applicable.

(f) The one (1) spray applicator, identified as Unit 011B, has potential particulate emissions of less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 are not applicable.

(g) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rates from the four (4) woodworking operations, identified as Units 002, 005, 006, and 007 and the two (2) sawdust heaters, identified as Units 003A and 004A, are as follows:

(1) For the four (4) woodworking operations, identified as Units 002, 005, 006, and 007 the allowable particulate emission rate shall not exceed 29.9 pounds per hour, total, when operating at a process weight rate of 38,776 pounds per hour (19.4 tons per hour).

After control by the baghouse, identified as CE-002, the particulate emission rate from the four (4) woodworking operations, identified as Units 002, 005, 006, and 007 is 2.75 pounds per hour, total. Therefore, the four (4) woodworking operations, identified as Units 002, 005, 006, and 007 can comply with this rule. The baghouse shall be in operation and control emissions from the four (4) woodworking operations at all times when any of the woodworking units are operating.

(2) For the two (2) sawdust heaters, identified as Units 003A and 004A, the allowable particulate emission rate shall not exceed 2.52 pounds per hour, total, when operating at a process weight rate of 969 pounds per hour (0.480 tons per hour).

The unrestricted potential to emit particulate emission rate of the two (2) sawdust heaters, identified as Unit 003A and Unit 004A, is 1.60 pounds per hour, total. Therefore, the two (2) sawdust heaters can comply with this rule.

These limitations are based on the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

326 IAC 8-1-6 (New facilities; general reduction requirements)

(a) The two (2) wood coating lines, identified as Lines 1 and 2, the one (1) hand roll edge, identified as Unit 011D, and the one (1) spray applicator, identified as Unit 011B, which are part of the one (1) wood coating line, identified as Line 3, were constructed before January 1, 1980. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

(b) The one (1) spray applicator, identified as Unit 011-1, which is part of the one (1) coating line, identified as Line 3, and installed in 2000, has potential VOC emissions of less than twenty-five (25.0) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-3-1 (Organic Solvent Degreasing Operations)

The one (1) product washing station, identified as Unit 013, was constructed before January 1, 1980, is part of a source which is located in Shelby County, and has potential VOC emissions of less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 8-3-1 (Organic Solvent Degreasing Operations) are not applicable.

326 IAC 8-2-10 (Flat wood panels; manufacturing operations)

(a) The two (2) wood coating lines, identified as Lines 1 and 2, the one (1) hand roll edge, identified as Unit 011D, and the one (1) spray applicator, identified as Unit 011B, which are part of the one (1) wood coating line, identified as Line 3, are located at a source which is in Shelby County. Therefore, pursuant to 326 IAC 8-2-1(a)(3), the requirements of 326 IAC 8-2-10 (Flat wood panels; manufacturing operations) are not applicable.

(b) The one (1) spray applicator, identified as Unit 011-1, which is part of the one (1) coating line, identified as Line 3, and installed in 2000, has potential, and thus actual VOC emissions of less than fifteen (15.0) pounds per day. Therefore, pursuant to 326 IAC 8-2-1(a)(4), the requirements of 326 IAC 8-2-10 (Flat wood panels; manufacturing operations) are not applicable.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

(a) The two (2) wood coating lines, identified as Lines 1 and 2, the one (1) hand roll edge, identified as Unit 011D, and the one (1) spray applicator, identified as Unit 011B, which are part of the one (1) wood coating line, identified as Line 3, were constructed before July 1, 1990. Therefore, pursuant to 326 IAC 8-2-1(a)(4), the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) are not applicable.

(b) The one (1) spray applicator, identified as Unit 011-1, and installed in 2000, has potential VOC emissions of less than fifteen (15.0) pounds per day. Therefore, pursuant to 326 IAC 8-2-1(a)(4), the requirements of 325 IAC 8-2-12 (Wood Furniture and Cabinet Coating) are not applicable.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The one (1) product washing station, identified as Unit 013, has potential VOC emissions of less than one hundred (100) tons per year. Therefore, pursuant to 326 IAC 8-6-1(2), the requirements of 326 IAC 8-6 (Organic Solvent Emission Limitations) are not applicable.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The Compliance Determination Requirements applicable to this source are as follows:

(a) The four (4) woodworking operations, identified as Units 002, 005, 006, and 007, controlled by a common baghouse, identified as CE-002, have the following Compliance Determination Requirements:

(1) The baghouse for particulate control, identified as CE-002, shall be in operation at all times when the four (4) woodworking operations, identified as Units 002, 005, 006, and 007, are in operation.

(2) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) The one (1) product washing station, identified as Unit 013, has the following Compliance Determination Requirement:

Compliance with the HAPs usage limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

The Compliance Monitoring Requirements applicable to this source are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Baghouse CE-002	Baghouse Inspections	Quarterly	Nondefective-Defective	Response Steps

These monitoring conditions are necessary because the baghouse, identified as CE-002, for the four (4) woodworking operations, identified as Units 002, 005, 006, and 007 must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations), 326 IAC 2-2, PSD, and 326 IAC 2-8 (FESOP).

Recommendation

The staff recommends to the Commissioner that the FESOP Permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 10, 2006. Additional information was received on October 23, 2006, December 15, 2006, January 3, 2007, and March 12, 2007.

Conclusion

The operation of this countertop manufacturing source shall be subject to the conditions of the attached **FESOP Renewal No. 145-22642-00034**.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: VTI of Indiana, Inc.
Address City IN Zip: 1406 South Meridian Street, Shelbyville, IN 46176
FESOP Renewal: F 145-22642-00034
Reviewer: Michael A. Morrone
Date: March 21, 2007

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 1																
Forbo Adhesive - Unit 009	9.08	45.0%	43.0%	2.00%	43.0%	59.00%	0.0002	8362	0.319	0.182	0.3037	7.289	1.33	0.00	0.308	100%
Forbo Adhesive - Unit 009B	9.08	45.0%	43.0%	2.00%	43.0%	59.00%	0.00010	8362	0.319	0.182	0.154	3.70	0.675	4.64	0.308	75%
Line 2										**Subtotal**	**0.458**	**11.0**	**2.00**	**4.64**		
Forbo Adhesive - Unit 010	9.08	45.0%	43.0%	2.00%	43.0%	59.00%	0.0002	8362	0.319	0.182	0.304	7.29	1.33	0.00	0.308	100%
Forbo Adhesive - Unit 010B	9.08	45.0%	43.0%	2.00%	43.0%	59.00%	0.00010	8362	0.319	0.182	0.154	3.70	0.675	4.64	0.308	75%
Line 3										**Subtotal**	**0.458**	**11.0**	**2.00**	**4.64**		
Global Tec GT20-4101	9.16	100%	99.98%	0.019%	100%	0.00%	0.0010	2664	9.16	0.002	0.005	0.111	0.020	0.00	n/a	75%
Wilsonart WA860	6.60	82.0%	6.40%	75.6%	6.40%	18.00%	0.00001	2664	5.33	4.99	0.106	2.54	0.464	0.00	27.7	100%
Wilsonart 3029 Adhesive	9.10	45.00%	43.17%	1.83%	43.17%	55.00%	0.00010	2664	0.293	0.167	0.045	1.08	0.196	1.48	0.303	75%
Product Washing										**Subtotal**	**0.16**	**3.7**	**0.680**	**1.48**		
Toluene Wash	7.24	100.0%	0.00%	100%	0.00%	0.00%	0.00002	19388	7.24	7.24	2.81	67.4	12.3	0.00	n/a	n/a
										Subtotal	**2.81**	**67.4**	**12.3**	**0.00**		
									PM Control Efficiency for 009B and 010B:	79.20%						
									Add worst case coating to all solvents	**Uncontrolled**	**3.88**	**93.1**	**17.0**	**10.8**		
										Controlled	**3.88**	**93.1**	**17.0**	**3.40**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: VTI of Indiana, Inc.
Address City IN Zip: 1406 South Meridian Street, Shelbyville, IN 46176
FESOP Renewal: F 145-22642-00034
Permit Reviewer: Michael A. Morrone
Date: March 21, 2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Hexane	Weight % Toluene	Weight % Vinyl Acetate	Weight % Methanol	Weight % Acetylaldehyde	Weight % Formaldehyde	Hexane Emissions (ton/yr)	Toluene Emissions (ton/yr)	Vinyl Acetate Emissions (ton/yr)	Methanol Emissions (ton/yr)	Acetylaldehyde Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Total Emissions (ton/yr)
Line 1																
Forbo Adhesive	9.08	0.0002	8362	0.00%	0.00%	0.083%	0.063%	0.006%	0.051%	0.00	0.00	0.055	0.042	0.004	0.034	0.135
Wilsonart 3029 Adhesive	9.10	0.0001	8362	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.000	0.000	0.000	0.000	0.00
Line 2																
Forbo Adhesive	9.08	0.0002	8362	0.00%	0.00%	0.08%	0.063%	0.006%	0.051%	0.00	0.00	0.055	0.042	0.004	0.034	0.135
Wilsonart 3029 Adhesive	9.10	0.0001	8362	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.000	0.000	0.000	0.000	0.00
Line 3																
Global Tec GT20-4101	9.16	0.0010	2664	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.000	0.000	0.000	0.000	0.00
Wilsonart WA860	6.58	0.00001	2664	5.00%	15.00%	0.00%	0.00%	0.00%	0.00%	0.038	0.115	0.000	0.000	0.000	0.000	0.154
Wilsonart 3029 Adhesive	9.10	0.0001	2664	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.000	0.000	0.000	0.000	0.00
Product Washing Station																
Toluene Wash	7.24	0.00002	19388	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00	12.3	0.000	0.000	0.000	0.000	12.3
								Total		**0.038**	**12.4**	**0.110**	**0.084**	**0.008**	**0.068**	**12.7**

METHODOLOGY

HAPs emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
Baghouse Operations

Company Name: **VTI of Indiana, Inc.**
Address City IN Zip: **1406 South Meridian Street, Shelbyville, IN 46176**
FESOP Renewal: **F 145-22642-00034**
Reviewer: **Michael A. Morrone**
Date: **March 21, 2007**

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)
CE 002	99.5%	0.010	32123	551	2412	2.75	12.1

Methodology
Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (cub. ft./min.) (60 min/hr) (lb/7000 grains)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Allowable Rate of Emissions

Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
38776	19.4	29.9

Methodology
Allowable Emissions = 4.10(Process Weight Rate)^0.67

Appendix A: Emissions Calculations
External Combustion Boiler
Wood Waste Combustion (uncontrolled)
Dry Wood

Company Name: VTI of Indiana, Inc.
Address City IN Zip: 1406 South Meridian Street, Shelbyville, IN 46176
FESOP Renewal: F 145-22642-00034
Reviewer: Michael A. Morrone
Date: March 21, 2007

Capacity (MMBtu/hr) 4.00

	Pollutant					
	PM*	**PM10***	**SO2**	**NOx**	**VOC**	**CO****
Emission Factor in lb/MMBtu	0.400	0.377	0.025	0.490	0.013	0.600
Potential Emissions in tons/yr	7.01	6.61	0.438	8.58	0.228	10.5

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:
Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/10^6 Btu/) x 2000 lbs/1 ton

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired bo

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

Appendix A: HAPs Emissions Calculations
External Combustion Boiler
Wood Waste Combustion (uncontrolled)
All Wood Waste Fuel Types

Company Name: VTI of Indiana, Inc.
Address City IN Zip: 1406 South Meridian Street, Shelbyville, IN 46176
FESOP Renewal: F 145-22642-00034
Reviewer: Michael A. Morrone
Date: March 21, 2007

Capacity (MMBtu/hr) 4.00

	Selected Hazardous Air Pollutants					
	Acrolein	**Benzene**	**Formaldehyde**	**Hydrogen Chloride**	**Styrene**	**Total HAPs**
Emission Factor in lb/MMBtu	0.004	0.004	0.004	0.019	0.002	
Potential Emissions in tons/yr	0.070	0.074	0.077	0.333	0.033	0.587

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/10^6 Btu/) x 2000 lbs/1 ton

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired bo

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

These factors include the five HAPs with the highest AP-42 emission factors.

Appendix A: Emissions Calculations
Sawdust Hoppers

Company Name: VTI of Indiana, Inc.
Address City IN Zip: 1406 South Meridian Street, Shelbyville, IN 46176
FESOP Renewal: F 145-22642-00034
Reviewer: Michael A. Morrone
Date: February 10, 2006

Facility/Operation	Throughput (lbs/hour)	Emission Factor (lb/ton)	PM Emissions (ton/year)	PM10 Emissions (ton/year)
Two (2) storage hoppers, identified as Units 003 and 004	969	PM = 0.75 PM10 =0.75	1.59	1.59
TOTAL EMISSIONS			**1.59**	**1.59**

Methodology
AP-42, Chapter 11, Section 4, Tables 11.17-3
PM Emissions = Throughput, lbs per hour*Emission factor (lb/ton)*8760/4000000

Appendix A: Emissions Calculations
Fugitive Emissions

Company Name: VTI of Indiana, Inc.
Address City IN Zip: 1406 South Meridian Street, Shelbyville, IN 46176
FESOP Renewal: F 145-22642-00034
Reviewer: Michael A. Morrone
Date: March 21, 2007

*** * unpaved roads * ***

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

1.00	trip/hr x	
0.140	mile/trip x	
2.00	(round trip) x	
8760	hr/yr =	2453 miles per year

PM

Method 1a: Ef = k*[(s/12)^0.9]*[(W/3)^b]

=	4.16	lb/mile
where k =	4.90	(particle size multiplier foı (k=4.9 for PM-30 or TSP)
s =	4.80	mean % silt content of unpaved roads
b =	0.450	Constant for PM-10 and PM-30 or TSP
W =	13.0	tons average vehicle weight
M =	0.200	surface material moisture content, % (default is 0.2 for dry

$$E = \frac{4.16 \text{ lb/mi} \times 2453 \text{ mi/yr}}{2000 \text{ lb/ton}} = 5.10 \text{ tons/yr}$$

Taking natural mitigation due to precipitation into consideration:

Eext = E * [(365-p)/365] = **3.35** tons/yr

where p = 125 days of rain greater than or equal to 0.01 inches(see Fig. 13.2.2-1)

PM-10

Method 1a: Ef = k*[(s/12)^0.9]*[(W/3)^b]

=	1.27	lb/mile
where k =	1.50	(particle size multiplier foı (k=4.9 for PM-30 or TSP)
s =	4.80	mean % silt content of unpaved roads
b =	0.450	Constant for PM-10 and PM-30 or TSP
W =	13.0	tons average vehicle weight
M =	0.200	surface material moisture content, % (default is 0.2 for dry

$$E = \frac{1.27 \text{ lb/mi} \times 2453 \text{ mi/yr}}{2000 \text{ lb/ton}} = 1.56 \text{ tons/yr}$$

Taking natural mitigation due to precipitation into consideration:

Eext = E * [(365-p)/365] = **1.03** tons/yr

where p = 125 days of rain greater than or equal to 0.01 inches(see Fig. 13.2.2-1)

Appendix A: Emissions Calculations
Summary

Company Name: VTI of Indiana, Inc.
Address City IN Zip: 1406 South Meridian Street, Shelbyville, IN 46176
FESOP Renewal: F 145-22642-00034
Reviewer: Michael A. Morrone
Date: March 21, 2007

Uncontrolled Potential Emissions

Signficant Emission Units	PM	PM-10	SO2	NOx	VOC	CO	Benzene	Toluene	Hexane	Acrolein	Formaldehyde	Hydrogen Chloride	Styrene	Total HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Four (4) Woodworking Operations, identified as Unit 002, Unit 005, Unit 006, and Unit 007	2412	2412	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Two (2) sawdust heaters, identified as Units 003A and 004A	7.01	6.61	0.438	8.58	0.228	10.5	0.074	0.00	0.00	0.070	0.077	0.333	0.033	0.513
Two (2) storage hoppers, identified as Units 003 and 004	1.59	1.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) product washing station, identified as Unit 13	0.00	0.00	0.00	0.00	12.3	0.00	0.00	12.3	0.00	0.00	0.00	0.00	0.00	12.3
One (1) Wood coating Line, identified as Line 1, consisting of:														
One (1) roller and spray application unit, identified as Unit 009	0.00	0.00	0.00	0.00	1.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) spray applicator, identified as Unit 009B	4.64	4.64	0.00	0.00	0.675	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) Wood coating Line, identified as Line 2, consisting of:														
One (1) roller and spray application unit, identified as Unit 010	0.00	0.00	0.00	0.00	1.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) spray applicator, identified as Unit 010B	4.64	4.64	0.00	0.00	0.7	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) Wood coating Line, identified as Line 3, consisting of:														
One (1) spray applicator, identified as Unit 011-1	0.00	0.00	0.00	0.00	0.020	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) hand roll edge, identified as Unit 011D	0.00	0.00	0.00	0.00	0.464	0.00	0.00	0.115	0.038	0.00	0.00	0.00	0.00	0.154
One (1) spray applicator, identified as Unit 011B	1.48	1.48	0.00	0.00	0.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal Significant Emission Unit	**2431**	**2431**	**0.438**	**8.58**	**17.2**	**10.5**	**0.074**	**12.4**	**0.038**	**0.070**	**0.077**	**0.333**	**0.033**	**13.0**
Insignificant Activities														
Fugitive Emissions from unpaved roads	3.35	1.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal Insignificant Activities	3.35	1.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	**2435**	**2432**	**0.438**	**8.58**	**17.2**	**10.5**	**0.074**	**12.4**	**0.038**	**0.070**	**0.077**	**0.333**	**0.033**	**13.0**

Company Name: VTI of Indiana, Inc.
Address City IN Zip: 1406 South Meridian Street, Shelbyville, IN 46176
FESOP Renewal: F 145-22642-00034
Reviewer: Michael A. Morrone
Date: March 21, 2007

Controlled and Limited Potential to Emit

Significant Emission Units	PM	PM-10	SO2	NOx	VOC	CO	Benzene	Toluene	Hexane	Acrolein	Formaldehyde	Hydrogen Chloride	Styrene	Total HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Four (4) Woodworking Operations, identified as Unit 002, Unit 005, Unit 006, and	131	82.3	0.00	0.00	0.00	0.00	0.00	0.0	0.00	0.00	0.00	0.00	0.00	0.00
Two (2) sawdust heaters, identified as Units 003A and 004A	7.01	6.61	0.438	8.58	0.228	10.5	0.074	0.00	0.00	0.070	0.077	0.333	0.033	0.513
Two (2) storage hoppers, identified as Units 003 and 004	1.59	1.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) product washing station, identified as Unit 13	0.00	0.00	0.00	0.00	12.3	0.00	Less than 9.67 for an individual HAP.							Less than 9.67 for an individual HAP; 9.71 total
One (1) Wood coating Line, identified as Line 1, consisting of:														
One (1) roller application unit, identified as Unit 009	0.00	0.00	0.00	0.00	1.33	0.00								
One (1) spray applicator, identified as Unit 009B	0.965	0.965	0.00	0.00	0.675	0.00								
One (1) Wood coating Line, identified as Line 2, consisting of:														
One (1) roller application unit, identified as Unit 010	0.00	0.00	0.00	0.00	1.33	0.00								
One (1) spray applicator, identified as Unit 010B	0.965	0.965	0.00	0.00	0.675	0.00								
One (1) Wood coating Line, identified as Line 3, consisting of:														
One (1) spray applicator, identified as Unit 011-1	0.00	0.00	0.00	0.00	0.020	0.00								
One (1) hand roll edge, identified as Unit 011D	0.00	0.00	0.00	0.00	0.464	0.00								
One (1) spray applicator, identified as Unit 011B	1.48	1.48	0.00	0.00	0.196	0.00								
Subtotal Significant Emission Unit	143	93.9	0.438	8.58	17.2	10.5								10.2
Insignificant Activities														
Fugitive Emissions from unpaved roads	3.35	1.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal Insignificant Activities	3.35	1.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	**146**	**94.9**	**0.438**	**8.58**	**17.2**	**10.5**	**Less than 10.0 for an individual HAP**							**10.2**